



# Elstree and Borehamwood Neighbourhood Plan

2025 to 2040



**Basic Conditions Statement**  
**January 2026**

**Prepared by the Neighbourhood Plan Steering Group on behalf  
of Elstree and Borehamwood Town Council**

## Contents

1.	Introduction .....	1
2.	Basic condition (i) - conformity with national planning policy.....	4
3.	Basic condition (iv) - contribution to sustainable development .....	15
4	Basic condition (v) - general conformity with the strategic policies of the development plan .....	18
5	Basic Condition (vi) - conformity with retained EU obligations .....	25
6	Basic condition (vii) - conformity with the prescribed conditions .....	25
7	Conclusion .....	26

## 1. Introduction

- 1.1. This Basic Conditions Statement has been produced to accompany the Elstree and Borehamwood Neighbourhood Plan (EBNP).
- 1.2. The relevant legal framework for the preparation and making of neighbourhood plans is supported by the Localism Act 2011 and the Neighbourhood Planning Act 2017 and found in the:
  - Town and Country Planning Act 1990: ss. 61F, 61I, 61M-P and Schedule 4B
  - Planning and Compulsory Purchase Act 2004: ss 38A-C
  - Neighbourhood Planning (General) Regulations 2012 (2012 No.637) (as amended)
- 1.3. Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990 requires a neighbourhood plan to meet five basic conditions before it can proceed to a referendum. These are:
  - i. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
  - ii. The making of the neighbourhood development plan contributes to the achievement of sustainable development;
  - iii. The making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
  - iv. The making of the neighbourhood development plan does not breach, and is otherwise compatible with, (retained) EU obligations; and
  - v. Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The prescribed condition is that the 'making' of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats etc.) Regulations 2007) (either alone or in combination with other plans or projects).
- 1.4. There are two further basic conditions which are relevant only to the making of a Neighbourhood Development Order and are therefore not considered in this document.
- 1.5. This document sets out how the EBNP meets the Basic Conditions.

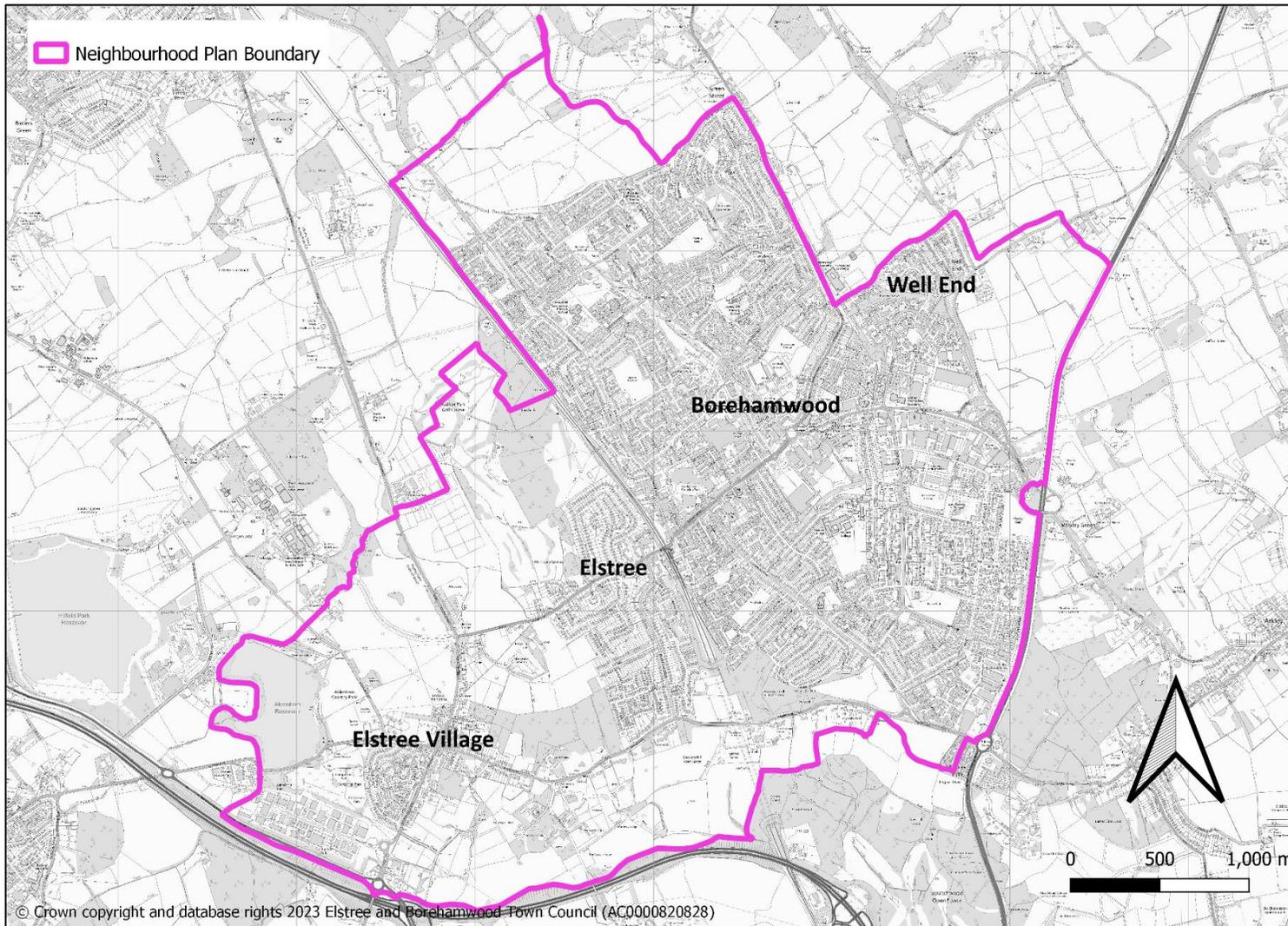
## Supporting documents and evidence

- 1.6. The Submission Version EBNP, with its policies, is supported by a Consultation Statement, this Basic Conditions Statement and an extensive evidence base. It has also been subject to a Screening, organised by Hertsmere Borough Council (HBC), to ascertain whether it requires a Strategic Environmental Assessment and/or a Habitat Regulations Assessment, and the Determination Statement is included as part of the accompanying documentation. Neither were required.
- 1.7. Alongside the planning policies, the EBNP contains a series of projects which fall outside planning policy. These are intended to contribute towards the achievement of the Plan's vision and could form the basis of the principles for the use of any developer funding and other monies arising from other planning obligations. They complement the Neighbourhood Plan document but are not a formal part of the Development Plan.

## Key statements

- 1.8. The Neighbourhood Area shares its boundary with that of the Elstree and Borehamwood Parish (*Figure 1*).
- 1.9. HBC designated the Elstree and Borehamwood Neighbourhood Area on 13 September 2002.
- 1.10. The EBNP sets out planning policies that relate to the development and use of land within the Elstree and Borehamwood Neighbourhood Area only.
- 1.11. The EBNP refers only to the administrative boundary of the Parish. There are no other adopted Neighbourhood Plans that cover all or part of the Elstree and Borehamwood Neighbourhood Area.
- 1.12. The Neighbourhood Plan Steering Group has prepared the EBNP to establish a vision for the future of the neighbourhood area. It has engaged with the community to set out how the vision will be realised through planning and controlling land use and development change over the plan period 2025 to 2040.
- 1.13. The Plan does not contain any policies which relate to excluded development as defined by section 61K of the Town and Country Planning Act 1990.

Figure 1: Elstree and Borehamwood Neighbourhood Development Plan designated area



## 2. Basic condition (i) - conformity with national planning policy

- 2.1. To meet this condition, it is necessary to demonstrate that the EBNP has regard to national planning policies and the advice contained in guidance issued by the Secretary of State. National policy and guidance are contained within the National Planning Policy Framework ('NPPF') and the Planning Practice Guidance ('PPG').
- 2.2. It should be noted that the Neighbourhood Plan has been prepared in accordance with the NPPF, most recently revised in December 2024 (with additional minor revisions in February 2025).

### National Planning Policy Framework

- 2.3. The NPPF has 13 key objectives which are:
- Delivering a sufficient supply of homes
  - Building a strong, competitive economy
  - Ensuring the vitality of town centres
  - Promoting healthy and safe communities
  - Promoting sustainable transport
  - Supporting high quality communications
  - Making effective use of land
  - Achieving well-designed places
  - Protecting Green Belt land
  - Meeting the challenge of climate change, flooding and coastal change
  - Conserving and enhancing the natural environment
  - Conserving and enhancing the historic environment
  - Facilitating the sustainable use of minerals
- 2.4. This Basic Conditions statement explains how the EBNP policies contribute to meeting these objectives, where relevant, and also notes the specific national policies that the Plan is intended to support and supplement.
- 2.5. The vision for the EBNP is:

In 2040, Elstree and Borehamwood will be a friendly, safe, clean and accessible place where people choose to live and stay, where the diversity of communities is celebrated.

We will continue to recognise each of our main settlements: Borehamwood, Elstree, Elstree Village and Well End, and find ways to celebrate their distinctiveness from one another and nearby areas, most notably outer London to the south, Radlett to the north and Shenley to the northeast. Restrict coalescence between settlements is vital to enable them to retain their identities and sense of place.

We will have carefully influenced the delivery of additional housing to tackle the overall shortage

in the area, prioritising the needs of our local residents in terms of family homes, homes suited to those wishing to downsize, and affordable homes, avoiding building on Green Belt. Alongside new homes, we will seek to influence the provision of services and facilities and other infrastructure so that it meets the needs of our community as it continues to grow. This includes the provision of a publicly accessible purpose-built theatre, community growing spaces (allotments), an additional medical facility (with priority for south Borehamwood) and additional safe spaces for our children and teenagers.

Borehamwood town centre will remain a vibrant focal point for the community offering a mix of retail shops, local services and facilities and leisure activities. We will support the Craft and Farmer's Market and provide attractive areas for residents to sit and socialise. We will also support a thriving night-time economy.

We will continue to treasure our film and television industry roots, while supporting our wider economic offering including both large scale employers and those starting out. The entire Neighbourhood Area will be recognised as a flourishing centre for the television and film and arts and creative industries. We will promote this sector, including the 'Elstree' brand, to encourage visitors to the area and create 'pride of place' among local residents.

We recognise the climate emergency and embed the need to mitigate climate change in all areas. This includes protecting our valued green spaces and wider countryside, safeguarding the Green Belt and improving our biodiversity through, for instance, the protection of green wildlife corridors, retention of green spaces and healthy, mature trees, the planting of new trees and the use of wildlife friendly features. We will emphasise the importance of carbon neutral design in all developments.

We will prioritise and support opportunities for safe active travel (walking, wheeling, cycling and equestrian) locally, promoting, extending and improving our network of rights of way. A key priority will be creating safe, attractive, well-signed routes that are not isolated and which connect residential areas to local facilities (shops, schools, surgeries etc.). Linked to this, where feasible, we will seek to provide car parking directed at those requiring disabled access, and e-charging points and facilities for other non-polluting vehicles across the area to promote a shift towards less polluting vehicles.

2.6. The six objectives, which collectively seek to deliver the vision, are shown in *Table 1*:

*Table 1: EBNP Objectives*

**OBJECTIVE 1: New development is designed to a high standard that is in keeping with the existing character of the area**

- Conserving our heritage assets for future generations.
- Telling the story of our area – how it has evolved and the communities who have settled here.
- Reinforcing the identity and sense of place.
- Incorporating high quality neighbourhoods that exhibit exemplary sustainable design.

**OBJECTIVE 2: A place that is accessible to enable and support healthy lifestyles**

- Encourage a priority for walking and cycling, particularly for local journeys.
- Enhancing the network of walking and cycling routes that link key services to housing and ensuring that new developments connect to this.
- Supporting initiatives to tackle congestion.

- Providing/improving disabled access and facilities for more senior members of the community.
- Supporting additional car parking provision for those with disabilities.

**OBJECTIVE 3: New and existing development promotes high levels of sustainability**

- Mitigating the impacts of climate change through design.
- Directing development to the most sustainable parts of the area, near to local facilities.
- Maximising opportunities for biodiversity.
- Supporting the use of alternative energy sources, for instance solar, wind and heat pumps, in appropriate locations.

**OBJECTIVE 4: New and existing development is safe and secure and promotes social interaction**

- Celebrating and supporting our diverse communities by providing a range of facilities, services and recreational activities to meet the needs of different ages, cultures and interests.
- Supporting our football club.
- Encouraging a friendly and involved community.
- Creating new and improving existing spaces to ensure they are safe and well-lit, to reduce crime and anti-social behaviour.

**OBJECTIVE 5: For Elstree and Borehamwood to keep welcoming and supporting future generations**

- Supporting the provision of homes to meet locally identified need, including affordable homes and homes for local residents.
- Influencing new housing that caters for occupants throughout their different stages of life.
- Revitalising the town centre as a safe, friendly and accessible destination offering a mix of retail, housing, local services and entertainment, most notably into the evening.
- Supporting employment opportunities within the television and film industry with greater involvement with the local community and provision of facilities.
- Safeguarding existing employers and sectors. Improve the environment locally to attract them.
- Providing a supportive environment for those working from home or starting a business.

**OBJECTIVE 6: Support healthy lifestyles through provisioning of safe and accessible green spaces**

- Restricting urban sprawl into the Green Belt.
- Protect, preserve and enhance existing green spaces and provide new ones too.
- Support initiatives to protect and enhance wildlife, biodiversity and habitat provision.
- Support provision of water activities, angling, wildlife and education at Aldenham Reservoir.
- Identifying and preserving locally important views.

- 2.7. The six objectives are shown in *Table 2* alongside the corresponding NPPF objective or objectives that each one seeks to address.
- 2.8. *Table 3* provides further detail by setting out the policies of the EBNP and which specific paragraphs of the NPPF each has had regard to along with a commentary.

Table 2: Assessment of the EBNP objectives against NPPF (2024) goals

EBNP objective	Relevant NPPF goal
<b>Objective 1: New development is designed to a high standard that is in keeping with the existing character of the area</b>	<ul style="list-style-type: none"> <li>• Making effective use of land</li> <li>• Achieving well-designed places</li> <li>• Conserving and enhancing the historic environment</li> <li>• Promoting healthy and safe communities</li> <li>• Meeting the challenge of climate change, flooding and coastal change</li> </ul>
<b>Objective 2: A place that is accessible to enable and support healthy lifestyles</b>	<ul style="list-style-type: none"> <li>• Promoting healthy and safe communities</li> <li>• Promoting sustainable transport</li> </ul>
<b>Objective 3: New and existing development promotes high levels of sustainability</b>	<ul style="list-style-type: none"> <li>• Meeting the challenge of climate change, flooding and coastal change</li> <li>• Conserving and enhancing the natural environment</li> <li>• Making effective use of land</li> <li>• Achieving well-designed places</li> <li>• Conserving and enhancing the natural environment</li> </ul>
<b>Objective 4: New and existing development is safe and secure and promotes social interaction</b>	<ul style="list-style-type: none"> <li>• Promoting healthy and safe communities</li> <li>• Achieving well-designed places</li> </ul>
<b>Objective 5: For Elstree and Borehamwood to keep welcoming and supporting future generations</b>	<ul style="list-style-type: none"> <li>• Promoting healthy and safe communities</li> <li>• Delivering a sufficient supply of homes</li> <li>• Making effective use of land</li> <li>• Protecting Green Belt land</li> <li>• Building a strong, competitive economy</li> <li>• Ensuring the vitality of town centres</li> </ul>
<b>Objective 6: Support healthy lifestyles through provisioning of safe and accessible green spaces</b>	<ul style="list-style-type: none"> <li>• Achieving well-designed places</li> <li>• Conserving and enhancing the natural environment</li> <li>• Protecting Green Belt land</li> </ul>

Table 3: Assessment of how each policy in the EBNP conforms to the NPPF

Policy Title and Reference	NPPF Ref.	Commentary
<p>Policy EB1: Achieving sustainable development</p>	<p>7, 8, 23, 30, 61, 67, 68, 71, 77, 96, 98, 109, 124, 125, 126, 129, 130, 142-160, 187, 203</p>	<p>A core principle of national policy is the need for the planning system to contribute to sustainable development. The NPPF states that plans should support strategic development needs as established in the adopted Local Plan and actively manage patterns of growth.</p> <p>Policy EB1 is an important policy in the context of the Plan. It seeks to ensure that any development is directed to the most appropriate, sustainable locations, where there is easy access to the main services and facilities. This will help to protect the wider landscape of the Parish, much of which is within the Metropolitan Green Belt, and safeguard against the coalescence of both the individual settlements that make up the neighbourhood area and coalescence with those nearby.</p> <p>The policy supports the development strategy set out in the adopted Local Plan and also the emerging Local Plan. It should be noted that the Steering Group agreed at an early stage not to allocate sites for development (a position discussed and agreed with HBC officers) as there was no local appetite to do so and it was anticipated that this would be undertaken via the new Local Plan.</p> <p>Policy EB1 is an important overarching policy that seeks to ensure that any future development – including speculative, windfall and future strategic sites - in the neighbourhood area is planned comprehensively and is sustainably located and delivered. It seeks to embed the principle of walkable neighbourhoods and supports the protection of the natural landscape, which is important in a built-up area such as Elstree and Borehamwood.</p> <p>The policy supports the reuse of brownfield land where feasible and where this can</p>

		<p>either safeguard employment or (where not possible) be brought forward as a mixed-use development and seeks to minimise coalescence between the individual communities within the area, to retain their distinctive identities.</p> <p>This will contribute to sustainable development by ensuring that development takes place in the most appropriate places.</p>
Policy EB2: Meeting local housing needs	62, 63, 64, 65, 66, 67, 68	<p>The NPPF sets out that the size, type, and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Whilst the EBNP does not seek to allocate housing sites, a position agreed with HBC, it does seek to influence the type and mix of housing to be delivered should sites come forward.</p> <p>Policy EB2 is underpinned by a Housing Needs Assessment that was prepared for the neighbourhood area. The policy supports the delivery of the recommendations of that report.</p> <p>The policy also seeks to encourage housing designed specifically to meet the needs of older people and people with special needs.</p>
Policy EB3: Character and design of development	124, 125, 129, 130, 131-141	<p>National policy actively encourages neighbourhood planning groups to develop policies that achieve well-designed places that reflect local aspirations, and which are grounded in an understanding and evaluation of the area's defining characteristics. Policy EB3 contributes to this aim by ensuring that development in the neighbourhood area is designed to respect the prevailing local character within which it is located.</p> <p>Underpinning the policy is the Elstree and Borehamwood Design Code and Guidance, which form an integral part of the EBNP and provides detailed guidance tailored to the local circumstances. It is an integral part of the neighbourhood plan and will inform the development of any future sites.</p>

<p>Policy EB4: Energy efficiency and design</p>	<p>131-134, 161-169</p>	<p>The policy supports the national ambition of creating sustainable places, by ensuring that development is designed using sustainable design principles to achieve an inclusive and accessible environment which respects and enhances local distinctiveness, and which mitigates and adapts to climate change. It sets out specific criteria to optimise sustainable design. In the absence of the Future Homes Standard, the policy is important in setting out expectations.</p>
<p>Policy EB5: Design of shop front signage</p>	<p>131, 132, 133, 141</p>	<p>Requiring good design is a key feature of national policy. Signage within the town centre can detract from local character and this has been the case in some instances in Borehamwood. Policy EB5 seeks to address this by setting out expectations for shopfront signage, based on evidence collated locally and adding additional local detail to the existing local authority shop fronts planning and design guidance.</p>
<p>Policy EB6: Heritage assets</p>	<p>135, 202, 203, 207-211, 212-218</p>	<p>Conserving and enhancing the historic environment is a key aim of national policy. The neighbourhood area has a wealth of heritage assets, some of which are already protected by way of national designation. Policy EB6 plans positively for the conservation and enjoyment of this heritage. It identifies three non-designated heritage assets that are considered to have historic value at the community level.</p> <p>The policy takes a proactive approach to supporting development proposals in the Elstree and Borehamwood and Bourton Conservation Areas, in a way that will enhance them.</p>
<p>Policy EB7: Borehamwood Town Centre, Elstree Village and smaller shopping areas</p>	<p>85, 86, 90, 96, 98, 109, 111, 125</p>	<p>The NPPF underlines the importance of town and village centres as the heart of the communities that they serve. Policy EB7 recognises the importance of Borehamwood Town Centre and the role it plays to for local residents, hosting a mix of uses including retail, community uses and arts and culture. Smaller centres, such as in Elstree Village and the shopping parades elsewhere, are also important focal points for the community. The policy supports mixed use development, to encourage a town centre</p>

		(and smaller centres) that not only provide a retail angle, but also a space for socialising, engaging in recreational activities and accessing other local amenities, including into the evening. There is an emphasis on ensuring the ongoing vitality of these centres by protecting against change of use to residential.
Policy EB8: A safe, attractive and welcoming public realm	90, 102, 109, 111, 131-141	Policy EB8 is closely related to Policy EB7, supporting proposals that will contribute to safe, inclusive and healthy places, which provide the social, recreational and cultural facilities and services the community needs. Design of public space underpins the ability to achieve this, and the policy sets out how this should be achieved in the Borehamwood setting. The Elstree and Borehamwood Design Code and Guidance provide further evidence to underpin the policy.
Policy EB9: Safeguarding existing commercial employment and supporting sustainable expansion	85, 86, 87	Within an area such as Elstree and Borehamwood, it is important that planning policies help to create the conditions in which businesses can invest, expand and adapt. The policy maps out strategic employment sites, in line with HBC policy, that should be safeguarded for such uses. The policy also recognises need to support the high number of small to medium businesses locally, including sole traders, many of whom operate from home.
Policy EB10: Supporting a world-class television, film and creative industries sector	85, 86, 87, 96, 98	The policy supports the national aims for enabling a strong economy, notably focussing on supporting the cultural and creative industry locally. The Neighbourhood Area has town has a rich, world-renowned film and TV heritage being home to Elstree Film Studios, Sky Elstree Studios and BBC Elstree. There is scope to further capitalise on this sector, not only to provide venues that will support the local community and associated leisure, training and employment opportunities, but also to further attract visitors to the area. The policy seeks to enhance the role of the creative industries in

		the area, supporting the delivery of HBC’s Creative Strategy and EBTC’s Culture and Creative Strategy. The policy also supports the aspiration to deliver a purpose-built publicly accessible theatre/performance space locally. Although there is a theatre within Hertswood Academy which should be publicly accessible, this has not yet happened.
Policy EB11: Supporting start-ups, flexible work space and homeworking	85, 86, 87	Policy EB11 aligns with the strategic need for planning policies to allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances. A high percentage of residents in the neighbourhood area work from home when compared to the national average. The policy supports this new work approach. It also strongly links to Policy EB10 in supporting business units, which could in turn support the creative industry sector.
Policy EB12: Landscape and biodiversity	136, 187, 188, 192, 193	This policy supports the national objective of ensuring that development contributes to and enhances the natural environment and biodiversity. It seeks to ensure that development proposals have carefully considered how they will mitigate their impacts on the natural environment and landscape and go further in contributing and enhancing it. It sets out the key features of the natural landscape that are particularly important and reflective of the area including trees and hedgerows. It supports the use of wildlife-friendly features within developments. The policy focusses on improving biodiversity locally, in line with national planning policy. In accordance with the Environment Act, the policy requires development proposals to deliver a biodiversity net gain of at least 10%, although at least 20% is encouraged in line with viability work prepared by HBC. Where this cannot be achieved on-site, there is a desire for it to be delivered within the neighbourhood area in the first instance, signposting the Hertfordshire Nature Recovery Strategy due to be published in 2026.
Policy EB13: Aldenham Country	85, 88, 96, 98, 103, 109, 111, 153-160, 187, 192	The policy seeks to support continued community access for the community to Aldenham Reservoir and its environs, including for recreational, leisure and cultural

Park and Reservoir		purposes. Opportunities to enhance biodiversity at the park will be welcomed. This supports the national ambition of providing access to open spaces and supporting a prosperous economy including tourism.
Policy EB14: Managing the environmental impact of development	96, 103, 125, 131, 136, 187, 188, 189	This policy supports the national aim of improving biodiversity. It identifies, at the neighbourhood level, the significant landscape features, such as trees, verges, waterways and banks and grassland – that are important assets to retain and, where possible enhance. Such features are not necessarily protected via other legislation, but can perform a wide range of functions including wildlife corridors, tackling air pollution and noise. The policy provides guidance to applicants on how they can best incorporate open space within development and wildlife friendly features, all of which will assist in maintaining a network of green corridors through an otherwise largely urban area.
Policy EB15: Local Green Space	106-108, 153-160	The NPPF enables communities to designate spaces that are demonstrably special to them as Local Green Space. The policy identifies 72 such spaces in the neighbourhood area. This may appear to be a high number, but is not unexpected given the built-up nature of the area. Protecting such spaces is vital for people’s physical and mental health and well-being, notably where they have no private access to such space as is the case in parts of the area. The evidence for the policy provides the justification as to how each meets the NPPF criteria. This will ensure that these spaces are protected against inappropriate development.
Policy EB16: Locally significant views	131-135, 187	The policy identifies 13 views that have been confirmed by the community as being particularly important to them and the area, for instance where they take in valued landscapes and/or heritage assets. This aligns with national policy, which supports neighbourhood planning groups in identifying the special qualities of each area and explaining how this should be reflected in development.
Policy EB17: Improving walking,	96, 105, 109-111, 115-117,	This policy supports the NPPF objective of encouraging sustainable modes of transport by encouraging the improvement of movement routes within the neighbourhood area

cycling and equestrian opportunities	135	<p>that would enable people to access local facilities and the wider countryside more easily and directly by foot and by bicycle, rather than relying on less sustainable modes of transport. It also considers accessibility for those less mobile. The area has a significant equine history and movement in the area by is fairly popular and recreational movement by this mode is also considered in the policy, particularly in terms of access to the wider surrounding countryside and in the context of there being fewer bridleways.</p> <p>The policy seeks to ensure that development proposals would link up to the movement route network and that existing public rights of way are protected, maintained and, where feasible, enhanced, to encourage greater and safer usage. It follows the 'walkable' neighbourhood concept, as promoted by a number of national bodies including the Town and Country Planning Association.</p> <p>The policy is supported by a series of associated projects and intervention areas which would improve the network that could be discussed with the Highways Authority and landowners.</p>
Policy EB18: Providing a range of community facilities	96, 98, 101, 103, 104	<p>The NPPF encourages policies that contribute to healthy, inclusive communities. The neighbourhood area benefits from a range of local facilities, which are valued by the community. The policy supports the provision of new/improved facilities as evidenced by the community engagement and provides a series of parameters against which these should be considered, to ensure their impacts on the environment are mitigated. These could form the basis of an infrastructure improvement plan for the neighbourhood area.</p>
Policy EB19: Public houses	96, 98	<p>National policy encourages Neighbourhood Plans to promote opportunities for meetings between members of the community who might not otherwise come into contact and to prevent the unnecessary loss of valued facilities and service. Policy EB19 protects drinking establishments against change of use as these are considered to be important social, recreational and cultural services that the community needs.</p>

### 3. Basic condition (iv) - contribution to sustainable development

- 3.1. The NPPF states in paragraph 7 that *'the purpose of the planning system is to contribute to the achievement of sustainable development.'*
- 3.2. For the EBNP, sustainable development has provided the fundamental basis of each of its policies. The National Planning Practice Guidance advises that *'sufficient and proportionate evidence should be presented on how the draft neighbourhood plan ... guides development to sustainable solutions'* (Planning Practice Guidance, Paragraph: 072 Reference ID: 41-072-20140306).
- 3.3. *Table 4* summarises how the overarching ambitions and policies in the EBNP contribute towards economic, social and environmentally sustainable development, as defined in the NPPF. Many of the ambitions of the EBNP overlap the three strands of sustainability, so for the purposes of this document, the most relevant strand has been taken to illustrate conformity.

*Table 4: Assessment of the EBNP ambitions and policies against sustainable development*

<b>Deliver economic sustainability</b>
<b>NPPF definition – <i>'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.'</i></b>
<b>EBNP Objectives:</b> <b>OBJECTIVE 5: For Elstree and Borehamwood to keep welcoming and supporting future generations</b>
<b>NP Policies:</b> Policy EB7: Borehamwood Town Centre, Elstree Village and smaller shopping areas Policy EB8: A safe, attractive and welcoming public realm Policy EB9: Safeguarding existing commercial employment and supporting sustainable expansion Policy EB10: Supporting a world-class television, film and creative industries sector Policy EB11: Supporting start-ups, flexible work spaces and homeworking
<b>Commentary:</b> The Plan includes five policies aimed at encouraging a strong economy. These recognise the significant role that the town centre plays for local residents including both its offer and also the public realm within which it operates. It is vital to secure this so that it can remain an accessible and viable centre. It also recognises the role of Elstree Village centre, as separate to Borehamwood, and also the smaller shopping areas beyond the main centres. Additionally, the policies recognise the need to support the renowned film and television industry that exists locally as well as opportunities for home working. In these ways, the Plan seeks to contribute to building a sustainable economy.

<b>Deliver social sustainability</b>
<b>NPPF definition – ‘to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.’</b>
<p><b>EBNP Objectives:</b>  <b>OBJECTIVE 2: A place that is accessible to enable and support healthy lifestyles</b>  <b>OBJECTIVE 4: New and existing development is safe and secure and promotes social interaction</b>  <b>OBJECTIVE 5: For Elstree and Borehamwood to keep welcoming and supporting future generations</b></p>
<p><b>NP Policies:</b>  Policy EB1: Achieving sustainable development  Policy EB2: Meeting local housing needs  Policy EB18: Providing a range of community facilities  Policy EB19: Public houses</p>
<p><b>Commentary:</b>  The NPPF underlines the importance of supporting strong, vibrant, inclusive and healthy communities by providing the supply of housing required to meet the needs of present and future generations and by creating a high-quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being.  The EBNP has been developed following community engagement to understand local priorities to contribute to this national objective. Whilst the Plan does not seek to allocate homes at this time, it does focus on the type, mix, size, tenure and affordability of housing that should be supported in the neighbourhood area, based on the findings of the local housing needs assessment, which offers a more nuanced picture compared to the wider strategic area.  The Plan includes policies to provide the social, recreational and cultural facilities and services to address the community’s needs.  A key principle of the EBNP is to support the sustainable location of new development. It supports active travel principles, whereby residents and visitors should have the opportunity to walk, “wheel”, cycle and ride safely if they choose. This will support healthier lifestyles and could also help to reduce local traffic on the roads.  In these ways, the Plan aims to support social sustainability.</p>
<b>Deliver environmental sustainability</b>
<b>NPPF definition – ‘to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy,’</b>
<p><b>EBNP Objectives:</b>  <b>OBJECTIVE 1: New development is designed to a high standard that is in keeping with the existing character of the area</b>  <b>OBJECTIVE 3: New and existing development promotes high levels of sustainability</b>  <b>OBJECTIVE 6: Support healthy lifestyles through provisioning of safe and accessible green spaces</b></p>

**NP Policies:**

Policy EB3: Character and design of development  
Policy EB4: Energy efficiency and design  
Policy EB5: Design of shop front signage  
Policy EB6: Heritage assets  
Policy EB12: Landscape and biodiversity  
Policy EB13: Aldenham Country Park and Reservoir  
Policy EB14: Managing the environmental impact of development  
Policy EB15: Local Green Space  
Policy EB16: Locally significant views  
Policy EB17: Improving walking, cycling and equestrian opportunities

**Commentary:**

Policies to celebrate, protect and enhance the natural and built environment of the neighbourhood area are an important element of the EBNP and conforms to the national aims set out in the NPPF.

A locally distinctive Elstree and Borehamwood Neighbourhood Area Design Guidance and Codes has been developed and forms an integral part of the EBNP, underpinning many of the policies. It sets out expectations including in relation to local character, design, biodiversity and environmental considerations.

In terms of local character, the plan seeks to consolidate all those elements that make the neighbourhood area – and its individual settlements distinctive. Alongside existing designations, this includes the identification of non-designated heritage assets and locally important views and viewpoints.

The Plan maps out the green spaces and environmental designations locally that form a network of habitats, with a view to encouraging their protection, improvement and connection. Natural features distinctive to the area are identified, to encourage their protection and for inclusion in the design of new development. A series of Local Green Spaces, considered to be demonstrably special to the community, are designated, and a number of locally significant views are identified.

The Plan emphasises the need to promote more sustainable modes of transport in order to reduce traffic congestion and carbon emissions, while supporting healthy lifestyles.

In these ways, the Plan seeks to contribute to protecting and enhancing the natural, built and historic environment of the neighbourhood area.

- 3.4. As demonstrated in *Table 3*, the strategic objectives of the Plan are considered to comprise a balance of social, economic, and environmental goals. The policies in the Plan demonstrably contribute to sustainable development.

## 4 Basic condition (v) - general conformity with the strategic policies of the development plan

- 4.1 The policies of the EBNP must be in general conformity with the adopted strategic policies of the HBC [Core Strategy](#) (adopted January 2013) and the [Site Allocation and Development Management Plan](#) (adopted November 2016).
- 4.2 The HBC Development Plan also comprises a series of 'made' neighbourhood plans and other supplementary planning guidance.
- 4.3 HBC is in the process of developing a new Local Plan for the Borough. Following the withdrawal of the previous draft Plan (in April 2022), a new Regulation 18 Version Local Plan to 2040 was published for consultation between 3 April and 29 May 2024. The [Local Development Scheme](#) (March 2025) anticipates that the new Local Plan will be submitted to Examination in mid-2026, with in Summer 2027.
- 4.4 The Regulation 18 Local Plan seeks to deliver a minimum of 9,400 new homes across the Borough to 2040 as well as additional employment land. Within the Neighbourhood Area, approximately 1,915 new homes are proposed and 9.1 ha of employment land, with further information contained in the [draft document](#). These are proposed to be allocated as follows:
- Borehamwood: 1,655 new homes and 2 ha employment land to the north of Hilton Doubletree and Sky Studios
  - Elstree Village: 260 new homes and 7.1 employment land to the south of Aldenham Reservoir
- 4.5 *Table 5* sets out which adopted Development Plan policies each EBNP policy conforms to, where strategic policies are prefixed with 'SP'.

Table 5: Relevant strategic policies

Policy Title and Reference	Adopted HBC policies	Commentary
Policy EB1: Achieving sustainable development	<p>Core strategy (2013): SP1, SP2, CS1, CS2, CS13, CS23, CS24</p> <p>Site Allocation and Development Management Plan (2016): SADM1-3, SADM22, SADM23, SADM26, SADM28</p>	<p>The policy aligns with strategic policy in supporting sustainable development, prioritising the efficient use of brownfield Land and avoiding inappropriate development in the Green Belt. Clearly national policy has evolved since the publication of the strategic documents and Policy EB1 acknowledges this.</p> <p>The emerging local plan includes a number of strategic allocations in the neighbourhood area, which are acknowledged in Policy EB1.</p>
Policy EB2: Meeting local housing needs	<p>Core strategy (2013): CS1-7</p> <p>Site Allocation and Development Management Plan (2016): SADM1-3</p>	<p>Strategic policy sets out housing need and a general indication of tenure and affordability. Policy EB2 adds additional local detail to this, evidenced by the Local Housing Needs Assessment. It is acknowledged that the EBNP will deliver not only against housing need at the local level, but also contribute to the wider strategic need.</p>
Policy EB3: Character and design of development	<p>Core strategy (2013): CS16, CS25</p> <p>Site Allocation and Development Management Plan (2016): SADM30</p>	<p>The EBNP provides additional local detail to the policies set out in the adopted Local Plan. This is achieved by way of the Elstree and Borehamwood Design Code and Guidance, which underpins Policy EB3 and forms an integral part of the neighbourhood plan.</p>

Policy Title and Reference	Adopted HBC policies	Commentary
Policy EB4: Energy efficiency and design	<p>Core strategy (2013): CS16, CS17</p> <p>Site Allocation and Development Management Plan (2016): SADM17, SADM30</p>	<p>This policy provides additional local detail to be ascribed at the local level. Sustainable design has moved on rapidly since the adoption of the Development Plan documents and the policy provides an updated set of criteria against which development proposals in the neighbourhood area should be considered.</p>
Policy EB5: Design of shop front signage	<p>Core strategy (2013): CS27, CS30</p> <p>Site Allocation and Development Management Plan (2016): SADM30, SAMDM47, SADM49</p>	<p>The policy conforms to local plan policy, while providing additional local detail as set out in the Elstree and Borehamwood Design Code and Guidance documents, prepared to underpin the EBNP.</p>
Policy EB6: Heritage assets	<p>Core strategy (2013): CS14</p> <p>Site Allocation and Development Management Plan (2016): SADM29</p>	<p>The policy provides additional local detail by defining three new non-designated heritage assets. It also provides additional detail on how applications in the Conservation Areas should be considered.</p>

Policy Title and Reference	Adopted HBC policies	Commentary
<p>Policy EB7: Borehamwood Town Centre, Elstree Village and smaller shopping areas</p>	<p>Core strategy (2013): CS27-30</p> <p>Site Allocation and Development Management Plan (2016): SADM43-49</p>	<p>The policy confirms to the strategic policies relating to town centres. In particular, it seeks to promote mixed uses within Borehamwood High Street that will help to ensure the ongoing viability of this important centre. Equally, the need to retain retail and other uses in Elstree Village and other, smaller shopping areas in the neighbourhood area are promoted.</p>
<p>Policy EB8: A safe, attractive and welcoming public realm</p>	<p>Core strategy (2013): CS18, CS1-CS23, CS27-30</p> <p>Site Allocation and Development Management Plan (2016): SADM30, SADM42</p>	<p>The policy complements the strategic policies in terms of supporting aspects of proposals that will contribute to an accessible and community focussed public realm.</p>
<p>Policy EB9: Safeguarding existing commercial employment and supporting sustainable expansion</p>	<p>Core strategy (2013): CS9, CS10</p> <p>Site Allocation and Development Management Plan (2016): SADM5-8</p>	<p>The policy conforms to strategic policy in terms of promoting and supporting the provision of employment locally. The policy maps out those areas within the neighbourhood area that are considered to be most important commercial employment areas, beyond the high street.</p>

Policy Title and Reference	Adopted HBC policies	Commentary
Policy EB10: Supporting a world-class television, film and creative industries sector	Core strategy (2013): CS11  Site Allocation and Development Management Plan (2016):SADM5-8	The policy complements the strategic policy in supporting and enhancing the role that the neighbourhood area plays in the film and television industry. Specific recommendations are provided in relation to how this might manifest itself at the local level.
Policy EB11: Supporting start-ups, flexible work space and homeworking	Core strategy (2013): CS8	Since the Covid-19 pandemic, more people have opted to work from home. This is true in the neighbourhood area. The policy supports such working, adding detail to local plan policies in supporting new ways of working that contribute to the overall economy,
Policy EB12: Landscape and biodiversity	Core strategy (2013): CS12, CS13, CS15  Site Allocation and Development Management Plan (2016): SADM10-12, SADM16	The policy supports the strategic aim of ensuring that development proposals protect biodiversity and provide for the management, enhancement, restoration and, if possible, expansion of biodiversity. It adds additional local detail by mapping the green and blue infrastructure network that underlies biodiversity habitats. It also adds more up-to-date detail on how development proposals should be considered within the Neighbourhood Area to contribute to this, in line with refreshed national policy, and the introduction of the biodiversity net gain requirement.
Policy EB13: Aldenham Country Park and Reservoir	Core strategy (2013): CS12, CS15, CS19  Site Allocation and Development Management Plan	Aldenham Reservoir is an important local asset and the policy sets out aspirations from the local level as to how it should best be used, which accord with broader strategic aims.

Policy Title and Reference	Adopted HBC policies	Commentary
	(2016): SADM10, SADM12, SADM34, SADM37	
Policy EB14: Managing the environmental impact of development	Core strategy (2013): SP1, CS12  Site Allocation and Development Management Plan (2016): SADM10, SADM12, SADM30	Closely aligned to Policy EB12, this policy identifies features of the landscape that contribute to landscape character, but which are not specifically protected in national or local strategic policy. This includes trees, waterways and banks, green verges, grassland and hedgerows for example. It sets out criteria against which development proposals in the Neighbourhood Area should be considered, in order to optimise the protection of biodiversity.
Policy EB15: Local Green Space	Core strategy (2013): CS1352, CS19  Site Allocation and Development Management Plan (2016): SADM	The adopted Core Strategy predates the introduction of Local Green Space.  Policy EB15 identifies specific sites within the neighbourhood area that meet the requirements set out in national policy to designate them as Local Green Space.
Policy EB16: Locally significant views	Core strategy (2013): CS12  Site Allocation and Development Management Plan (2016): SADM11, SADM30	The policy protects a series of local views that have been identified by the local community as being particularly important and reflective of local character and sense of place. This is underpinned at the strategic level by the objective to protect and where possible, enhance local character, which would include key public views and vistas.

Policy Title and Reference	Adopted HBC policies	Commentary
Policy EB17: Improving walking, cycling and equestrian opportunities	Core strategy (2013): CS18, CS22, CS26  Site Allocation and Development Management Plan (2016): SADM30	The policy adds additional local detail to the strategic policies, which require new development to make improvements, where appropriate, to the existing infrastructure network including for pedestrians, cyclists and those with reduced mobility. Policy EB17 is supported by additional detail which sets out specific interventions identified by the community where such improvements would make a tangible difference to users.
Policy EB18: Providing a range of community facilities	Core strategy (2013): CS19  Site Allocation and Development Management Plan (2016): SADM32-37	The policy aligns with strategic policy in terms of safeguarding community facilities. It is underpinned by evidence setting out where enhancements to existing, or provision of new, facilities would be welcomed.
Policy EB19: Public houses	Core strategy (2013): CS19  Site Allocation and Development Management Plan (2016): SADM32	The policy recognises the important role that public houses play in terms of their contribution as meeting spaces and places to relax and socialise. This aligns with the aspirations of the development plan in terms of promoting social settings and retaining core community facilities.

## 5 Basic Condition (vi) - conformity with retained EU obligations

- 5.1 The EBNP, and the process under which it was made, conforms to the Strategic Environmental Assessment (SEA) Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 5.2 In accordance with Regulation 9 of the SEA Regulations 2004, HBC, as the responsible authority, determined in May 2024 that a Strategic Environmental Assessment (SEA) is not required as the EBNP's policies – individually or collectively - are unlikely to have significant environmental effects.
- 5.3 The [SEA Screening Statement](#) is contained within the evidence base submitted alongside the Submission Version EBNP.

## 6 Basic condition (vii) - conformity with the prescribed conditions

- 6.1 Under Directive 92/43/EEC, also known as the Habitats Directive (Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora'), it must be ascertained whether the EBNP is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulations Assessments ("HRA"). An appropriate assessment ("AA") is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether it is necessary to undertake an assessment, a screening process is followed.
- 6.2 HBC, as the responsible authority, determined in May 2024 that the EBNP is unlikely to have significant impact on European sites and therefore does not require a full HRA to be undertaken.
- 6.3 In addition to conforming to its EU obligations, the EBNP does not breach and is not otherwise incompatible with the European Convention on Human Rights.
- 6.4 The [HRA Screening Statement](#) is contained within the evidence base submitted alongside the Submission Version EBNP.

## **7 Conclusion**

- 7.1. The relevant basic conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Elstree and Borehamwood Neighbourhood Plan and all the policies therein. It is therefore respectfully suggested to the Examiner that the EBNP complies with Paragraph 8(1) (a) of Schedule 4B of the Act.